

From: Leko, Bill - William F [Bill.F.Leko@store.lowes.com]
Sent: Monday, June 16, 2014 15:08
To: Doug S. Wright; Call, Melissa - Melissa M
Cc: Funkhouser, Ryan - Ryan R
Subject: RE: Emergency Generator at 3535 Rhea County Highway, Dayton, TN 72-0129

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Melissa could you help me out with this on documentation to the state of Tenn.
Need fuel we used for the generator and the sulfur content... need this for our permit requirement.
. Doug is from Nashville office for the environmental agent.. see his address below,
please reply
thanks Bill Leko store manager #2866 Dayton TN,

From: Doug S. Wright [mailto:Doug.S.Wright@tn.gov]
Sent: Monday, June 16, 2014 3:25 PM
To: Leko, Bill - William F
Subject: Emergency Generator at 3535 Rhea County Highway, Dayton, TN 72-0129
Mr. Leko,

Thank you for taking the time to talk to me this afternoon. I called because your existing construction permit has a fuel sulfur limit of 500 parts per million (or 15 pounds per hour), but your new permit will have a more strict sulfur limitation of 15 parts per million (0.45 pounds per hour). I have attached two documents. The September 16, 2009 document indicates that your fuel sulfur content was 0.05% or 500 parts per million in 2009. The other document is your current permit that requires an update to meet the current EPA regulations. Condition 6 addresses your fuel sulfur content. Please be aware that the EPA regulations at 40 Code of Federal Regulations (CFR) 60.4207 (b) requires: "(b) Beginning October 1, 2010, owners and operators of stationary CI ICE subject to this subpart with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted."

EPA regulations at 40 CFR 80.510 requires:

"(b) *Beginning June 1, 2010.* Except as otherwise specifically provided in this subpart, all NR and LM diesel fuel is subject to the following per-gallon standards:

(1) Sulfur content.

(i) 15 ppm maximum for NR diesel fuel."

The new permit I am preparing will have the new 15 parts per million (ppm) standard. The fuel you're using may already be in compliance, but I would like to make sure before I draft a new permit. I believe that you can contact your diesel fuel supplier to get this information, and I would like some sort of written documentation for my own records here no later than the close of business on Wednesday, June 18, 2014. You can email that document to me here. I believe these fuel sulfur requirements are being applied equally to everyone that uses diesel engines of that size.

The person I tried to call at your corporate office was Melissa Call at 336-658-2181, but the phone number was invalid. I got your name and number from the report that Jeff Kent generated after his visit on February 24, 2014.

This is the website I use to access these regulations:

http://www.ecfr.gov/cgi-bin/text-idx?sid=27d0dad4dd3d4c1969aad205b798e315&c=ecfr&tpl=/ecfrbrowse/Title40/40tab_02.tpl

Please call or email if you have questions.

Thanks,

Doug Wright

TN Dept. of Environment and Conservation (TDEC)

Division of Air Pollution Control

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